

TSD File Inventory Index

Date: April 16, 2000

Initial: CMH/ewh

Facility Name: <u>Hannu Maine Position (Re-feld, etc)</u>	
Facility Identification Number: <u>LD 069 496 248</u>	
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.1 Correspondence	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	C.2 Compliance/Enforcement
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.5 Change Under Interim Status Requests	.2 Import/Export Notifications
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Total - 1

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.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
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.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1			

Note: Transmittal Letter to Be Included with Reports.

Comments: Be folder side



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD069496248

REACKNOWLEDGEMENT

HANNAH MARINE CORPORATION
PO BOX 189
LEMONT

IL 60439

INSTALLATION ADDRESS

KINGERY RD AT ARCHER AVE
LEMONT

IL 60439

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER										APPROVED										DATE RECEIVED (yr., mo., & day)									
1LD0694962482										A										800818									

I. NAME OF INSTALLATION

HANNAH MARINE CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

PO BOX 189

CITY OR TOWN

LEMONT,

ST.

IL

ZIP CODE

60439

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 KINGERY RD AT ARCHER AVE

CITY OR TOWN

LEMONT

ST.

IL

ZIP CODE

60439

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 LAMBERT CARL MGR SAFETY-COMPLC

PHONE NO. (area code & no.)

312-242-3210

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 SEE ATTACHED HANNAH MARINE CORPORATION

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

1LD069496248

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

S	W	1	L	D	0	6	9	4	7	6	2	4	8	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 1 9	U 2 2 0	U 2 3 9			
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Gene V. Sabber

NAME & OFFICIAL TITLE (type or print)

Manager-Shipyard Operations

DATE SIGNED

8/12/80



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

AUG 25 1982

Mr. Carl F. Lambert, Manager of Safety/Compliance and Employee Relations
Hannah Marine Corporation
P. O. Box 189
Lemont, Illinois 60439

RE: Request for Information--Hazardous Waste Permit
Review (Storage Fewer Than 90 Days)
FACILITY NAME: Hannah Marine Corporation
USEPA ID NO.: ILD-069-496-248

Dear Mr. Lambert:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to accumulate wastes generated on site for less than 90 days in containers or tanks as defined in 40 CFR Part 262.34 (enclosed). Please review these requirements to determine if your facility qualifies as an accumulation facility from November 19, 1980, to the present. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Storage fewer than 90 Days," in all correspondence on this matter.

Sincerely yours,



Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Handwritten: 102 2/25/82



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

SEP 1 1981

Hannah Marine Corporation
Mr. Carl F. Lambert, Manager
P.O. Box 189
Lemont, Illinois 60439

RE: Hazardous Waste Permit Application-Incomplete Part A (ILD069496248)
Facility Name (and EPA ID number)
Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by October 1, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 1, 1981. *Nov 1, 1981*

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Allen Debus, the reviewer of your application, at (312) 886-6162 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi
Arthur S. Kawatachi
Regional Project Officer

Enclosure

RECEIVED

NOV 2 1981

WASH. FIELD OFFICE BRANCH
EPA REGION V

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

RECEIVED
11/2/81



Superior Engineering Corp.

Consulting Engineers

2345 167th ST. HAMMOND, IND. 46323

CUSTOMER

HANNAH MARINE

SHT.

2 OF 5

SUBJECT

SPCL PLAN

JOB NO.

25301

AREA #2

BY

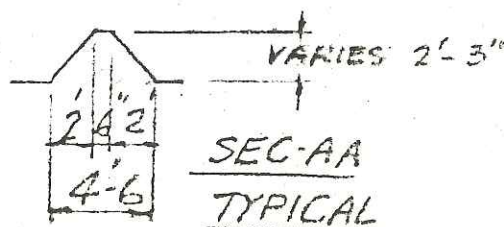
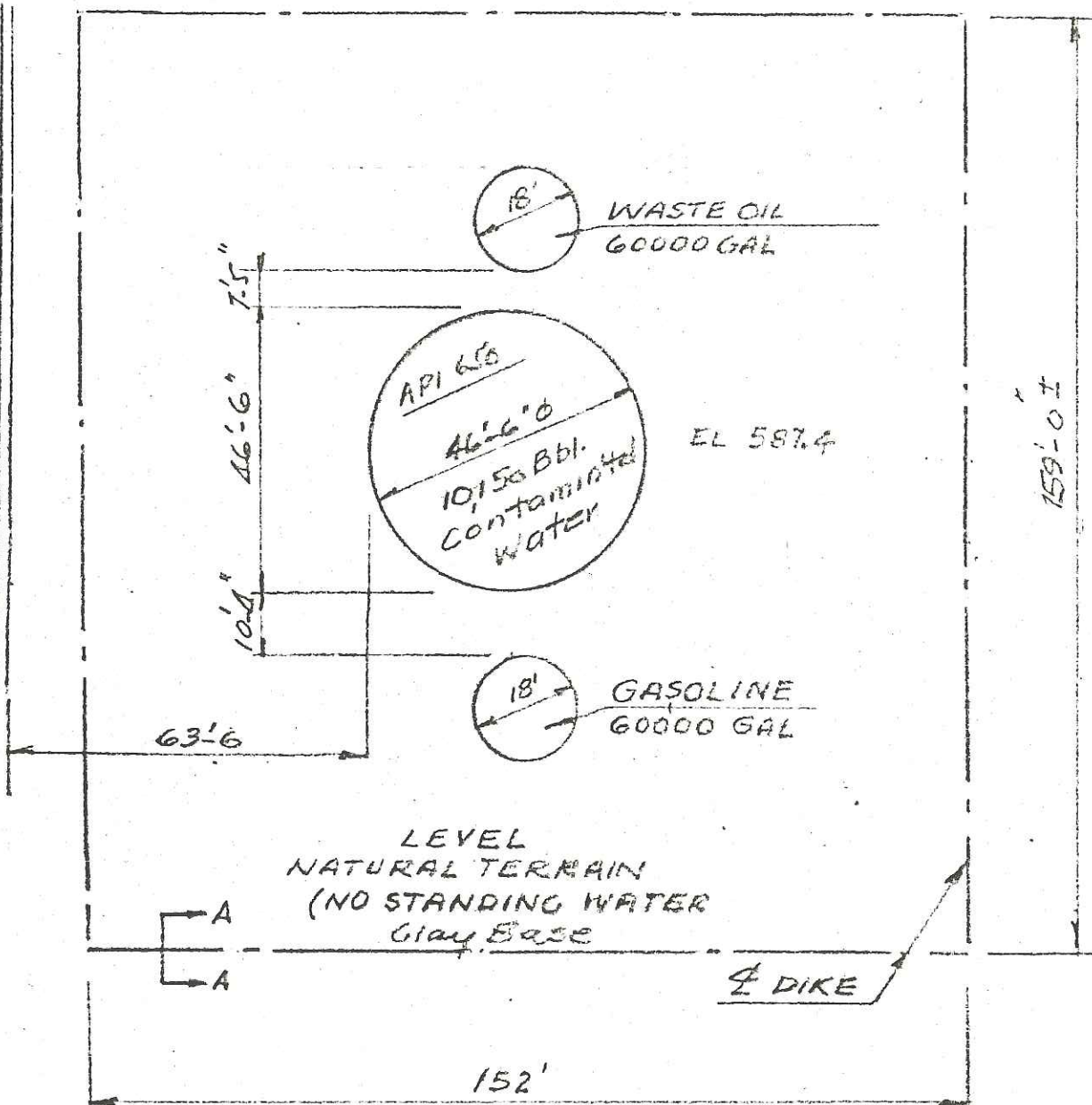
DATE

RGB 2-8-80

738

EARTHENDIKE PLAN

PROCESS UNIT DIKE

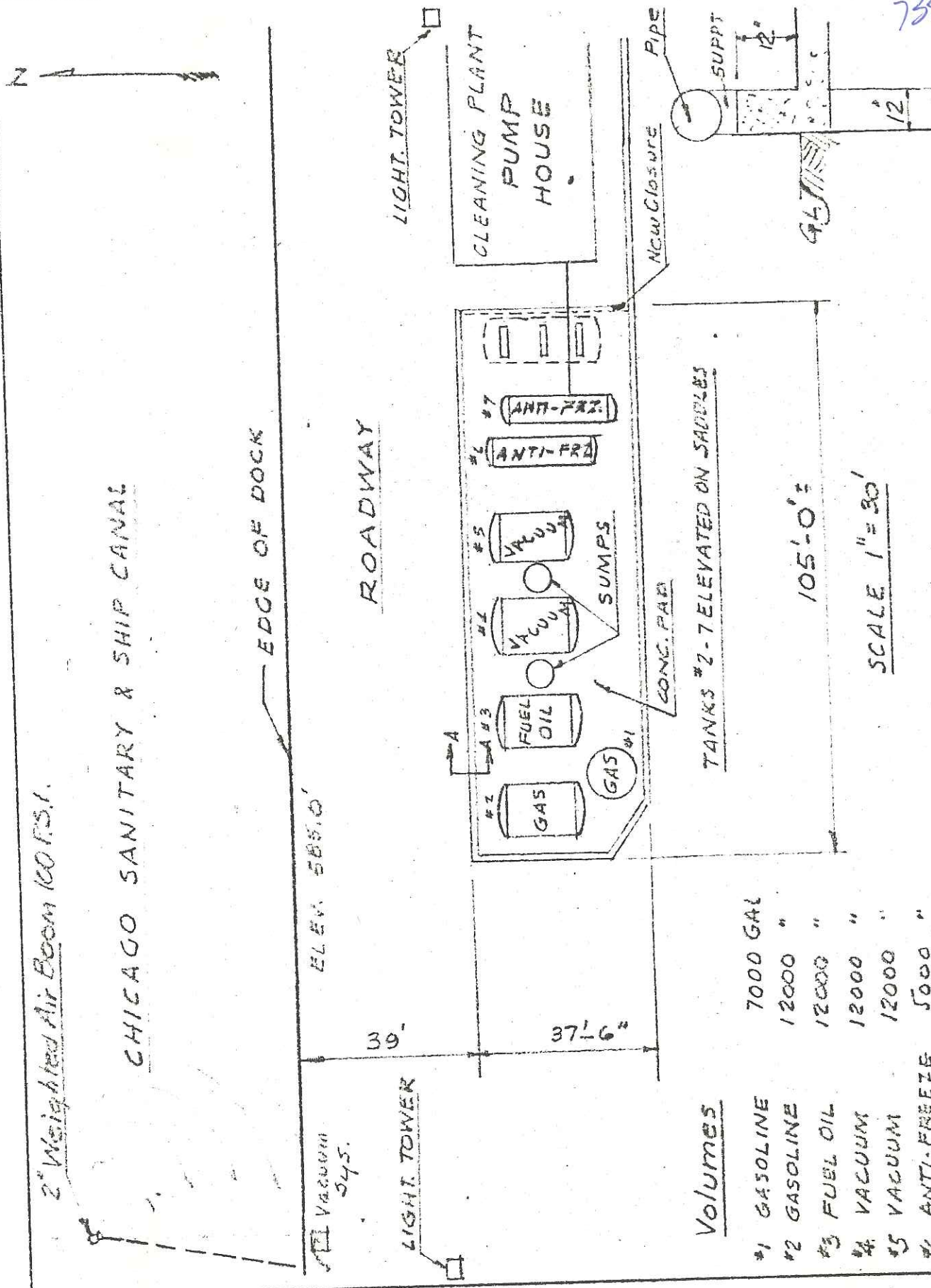


SCALE
1"=30'



738

SEC A-A



Volumes	
#1 GASOLINE	7000 GAL
#2 GASOLINE	12000 "
#3 FUEL OIL	12000 "
#4 VACUUM	12000 "
#5 VACUUM	12000 "
#6 ANTI-FREEZE	5000 "
#7 ANTI-FREEZE	4500 "
#8 FUTURE	

PLEASE NOTE

We have a new mailing address for all Region V RCRA activities.

RCRA ACTIVITIES
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

The following RCRA activities should be submitted to the address above:

- a. Inquiries on ID numbers;
- b. Notification of Hazardous Waste Activity (EPA Form 8700-12);
- c. Part A of the RCRA treatment, storage, and/or disposal (TSD) facility permit application, Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3);
- d. Part B of the RCRA TSD facility permit application;
- e. Manifest reports (exception, discrepancy and unmanifested waste);
- f. Financial responsibility documents; and
- g. Annual reports.

You can get information and answers to specific questions relating to Interim Status Standards and the Federal hazardous waste management program in your State by calling (312) 353-2197 and asking for RCRA hazardous waste regulations assistance. Region V has numerous technical staff who are available to help industry comply with the hazardous waste regulations under RCRA. Trained professionals provide accurate, up-to-date general information on the regulations and also answer questions regarding specific problems.

We have also designated State Implementation Officers (SIO) in the Regional Office who are responsible for coordinating the Federal and State efforts in the operation of the Federal hazardous waste management program. If you have questions on how the relationship between USEPA and State Agencies affect your operation, ask for the designated SIO when you call (312) 353-2197.



CORPORATION

KINGERY ROAD AT ARCHER AVENUE

LEMONT, ILLINOIS 60439

(312) 242-3210

November 19, 1980

Y. J. Kim
EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Dear Mr. Kim:

Since filing our first Notification of Hazardous Waste Activity in August of 1980, we have purchased a vacuum truck and now wish to amend our notification to include transportation activity. In order to do so, I have enclosed copies of our original Notification of Hazardous Waste Activity which have been amended to reflect the request for transportation and subsequent notification.

Very truly yours,

Carl F. Lambert
Manager of Safety and Operations

CFL/ds

enclosure



ITEM #8: Hannah Marine Corporation leases the property it occupies from the Metropolitan Sanitary District of Chicago on a ninety-nine year lease of which some seventy years remain. The facilities on the property in the meantime are for all purposes, the property of HANNAH MARINE CORPORATION.

ITEM #9: E.I. Ignitable:
Hannah Marine Corporation is in the business of transporting petroleum and chemical products by barge. When cleaning a barge between loads, a diluted waste of the product previously transported is generated. Such products as gasoline, (regular and no-lead), #2 oil, #6 oil, jet aviation fuel, nonene, tetramer are carried, and therefore generated as waste.
E.2. In the same manner, caustic soda barges are cleaned at our Lemont facility and a diluted caustic solution is generated.

NOTE: It should be noted that many of the substances recaptured from barges are used as fuel for our compressor or for resale as usable energy sources. We anticipate the installation of a water separator at our facility to recapture even more materials for use or resale.

AUG 13 1980

FORM 1		ENVIRONMENTAL PROTECTION AGENCY		I. EPA I.D. NUMBER	
GENERAL		GENERAL INFORMATION		TLD 069496248	
Consolidated Permits Program		(Read the "General Instructions" before starting.)		3 D	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					
II. POLLUTANT CHARACTERISTICS					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.					
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS	
		YES NO FORM ATTACHED			
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	
III. NAME OF FACILITY					
1 SKIP HANNAH MARINE CORPORATION					
IV. FACILITY CONTACT					
A. NAME & TITLE (last, first, & title)			B. PHONE (area code & no.)		
2 LAMBERT CARL F MGR SAFETY COMP			3 1 2 2 4 2 3 2 1 0		
V. FACILITY MAILING ADDRESS					
A. STREET OR P.O. BOX					
3 P O BOX 189					
B. CITY OR TOWN					
4 LEMONT					
C. STATE					
I L					
D. ZIP CODE					
6 0 4 3 9					
VI. FACILITY LOCATION					
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
5 KINGERY ROAD AT ARCHER AVENUE					
B. COUNTY NAME					
J PAGE					
C. CITY OR TOWN					
6 LEMONT					
D. STATE					
I L					
E. ZIP CODE					
6 0 4 3 9					
F. COUNTY CODE (if known)					
043					

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7									C	7								
15	16	17	18	19						15	16	17	18	19					
C. THIRD										D. FOURTH									
C	7									C	7								
15	16	17	18	19						15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																																																		B. Is the name listed in Item VIII-A also the owner?									
8 HANNAH MARINE CORPORATION																																																		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 65 66									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)																													
F = FEDERAL										M = PUBLIC (other than federal or state)										(specify)										C A 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30																													
S = STATE										O = OTHER (specify)																																																	
P = PRIVATE																																																											
E. STREET OR P.O. BOX																																																											
P O BOX 189																																																											
F. CITY OR TOWN																														G. STATE					H. ZIP CODE					IX. INDIAN LAND																			
B L E M O N T																														I L					6 0 4 3 9					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52																			

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
9 N															9 P														
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
9 U															(specify)														
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
9 R															(specify)														

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Hannah Marine Corporation shipyard operation: Top water repair of barges, requires cleaning of barges prior to repair, thus generating waste material from barge's previous cargo. We may in the future wish to store waste material for longer than 90 days.

Primary function of Hannah Marine Corporation is transportation of bulk liquid chemicals and petroleum products by barge.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
David E. Updegraff, VP OPS		David E. Updegraff		11-17-80	

COMMENTS FOR OFFICIAL USE ONLY

C																			
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30				

David E. Updegraff
Executive Vice President
Hannah Marine Corporation
Suite 101
361 Frontage
Burr Ridge, Illinois 60521

RE: Withdrawal of Part A Hazardous Waste
Permit Application
FACILITY NAME: Hannah Marine Corporation
U.S. EPA ID NO.: ILD069496248

Dear Mr. Updegraff:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed its review of your Part A Hazardous Waste Permit Application, and your letter of June 7, 1983, requesting the withdrawal of your permit application. According to the information you have submitted, your facility was not an existing hazardous waste management facility on November 19, 1980 and does not presently manage hazardous waste. It is the opinion of this office, based on the information submitted, that your facility does not have interim status and a permit under Section 3005 of the Resource Conservation and Recovery Act is not required at this time.

If at any time in the future your facility plans to treat, store, or dispose of hazardous waste a permit would be required as a new facility according to 40 CFR 270.10(f).

Please contact the Regulatory Analysis and Information Unit at (312)886-6148 for assistance, if you have any questions.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Illinois Environmental Protection Agency

JP
5-15-84



June 7, 1983

United States
Environmental Protection Agency
Region V
RCRA Activities
P.O. Box 3587A
Chicago, IL 60690-3587

RECEIVED

JUN 13 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

RE: Hazardous Waste Permit Application
FACILITY NAME: Hannah Marine Corporation
USEPA ID NO.: ILD-069-496-248 PA, G, TRS

Gentlemen:

Per your letter dated August 25, 1982 indicating that we do not need the subject permit under Section 3005 of the Resource Conservation and Recovery Act, we hereby request that you withdraw our application at this time.

Enclosed is a copy of the Hannah Marine Corporation Closure Plan which you have requested along with our withdrawal request.

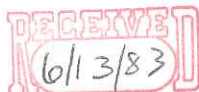
Sincerely,

HANNAH MARINE CORPORATION

DAVID E. UPDEGRAFF
Executive Vice-President

DEU/da

Encl





KINGERY ROAD AT ARCHER AVENUE LEMONT, ILLINOIS 60439 (312) 242-3210

November 18, 1980

Y. J. Kim
EPA Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Kim:

Hannah Marine Corporation leases the property it occupies from the Metropolitan Sanitary District of Chicago on a ninety-nine year lease of which some seventy years remain. The facilities on the property in the meantime are for all purposes, the property of Hannah Marine Corporation.

Hannah Marine Corporation is in the business of transporting petroleum and chemical products by barge. When cleaning the barge between loads, a diluted waste of the product previously transported is generated. Such products as gasoline, #2 oil, #6 oil, jet aviation fuel, nonene, tetramer are carried, and therefore generated as waste. In the same manner, caustic soda barges are cleaned at our Lemont facility and a diluted caustic solution is generated. We anticipate the installation of a water separator at our facility to recapture materials. We also anticipate the installation of additional tankage at our facility which may, in the future, be used for storage of waste material in excess of 90 days.

Very truly yours,

A handwritten signature in blue ink that reads "Carl F. Lambert". The signature is fluid and cursive, with the first and last names being more prominent.

Carl F. Lambert
Manager of Safety and Operations

CFL/ds

Print or type in the unshaded areas only
in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER	
			ILD0694962483	13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)	<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)
71	71
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
YR. MO. DAY 8 5 1 0 8 2 3	YR. MO. DAY 73 74 75 76 77 78

B. REVISED APPLICATION (place an "X" below and complete Item I above)

<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS	<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT
72	72

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

5	C										DUP	T/A	C	1																
1	2	13 14 15										16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32		
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)					2. UNIT OF MEASURE (enter code)								1. AMOUNT					2. UNIT OF MEASURE (enter code)										
X-1	S 0 2	600					G						5																	
X-2	T 0 3	20					E						6																	
1	S 0 8	500,000 gallons					G						7																	
2	T 0 4	none at present					-						8																	
3													9																	
4													10																	

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

We are currently seeking information on a biological treatment plant so that we could dispose of some material on site. In the meantime we are using other disposal sites and not storing waste materials.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
S										T/A	C								
W	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
110069496248										DUP									

[illegible]

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F I L D 0 6 9 4 9 6 2 4 8 3 6

FLA/55

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FLA/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F G

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

David E. Updegraff

B. SIGNATURE

David E. Updegraff

C. DATE SIGNED

11-17-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

David E. Updegraff

B. SIGNATURE

David E. Updegraff

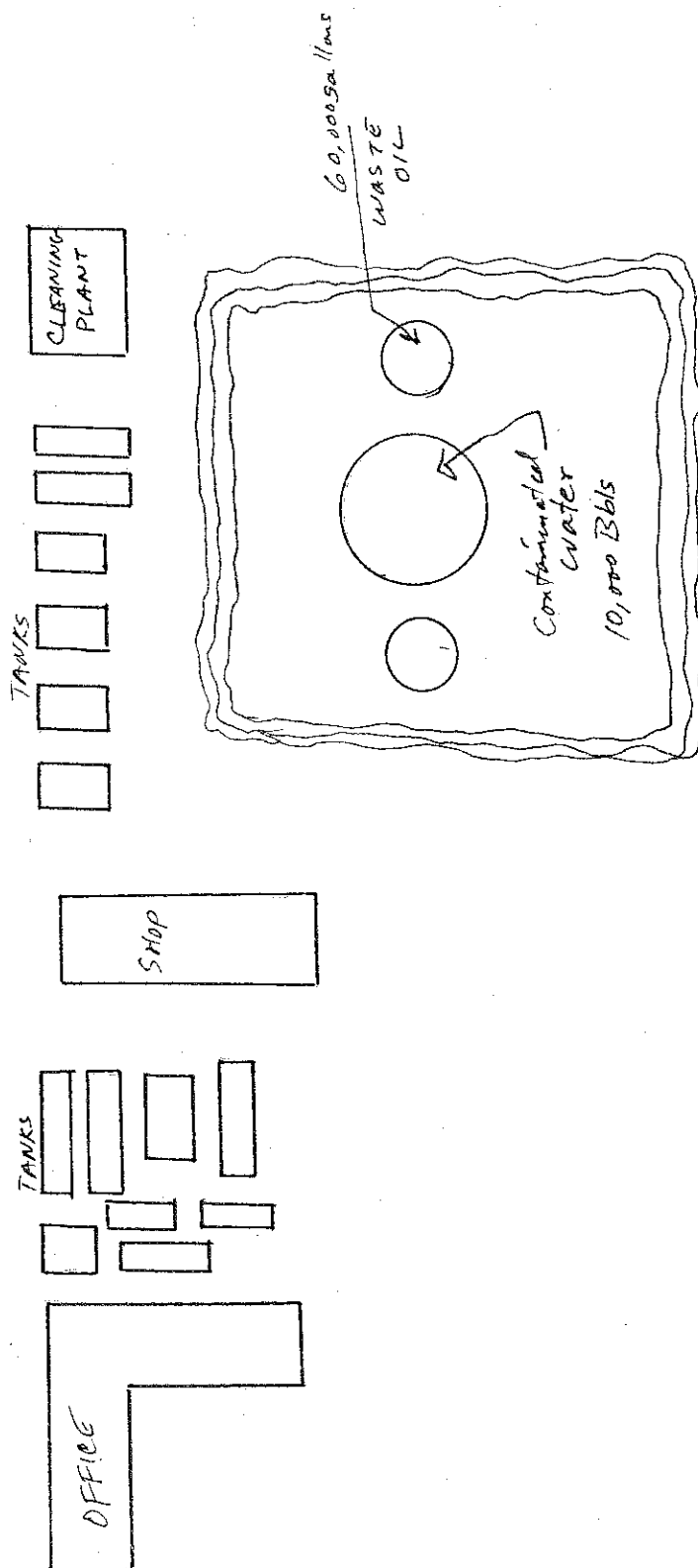
C. DATE SIGNED

11-17-80

V. FACILITY DRAWING (see page 4)

738

CHICAGO SANITARY SHIP CANAL



HANNAH MARINE CORPORATION

CLOSURE PLAN

There is no potential for partial closure of HANNAH MARINE CORPORATION's shipyard facility.

In the event that HANNAH MARINE CORPORATION closes down its shipyard facility, the following procedures will be followed:

1. All storage tanks will be emptied of contents - contents sold if possible; if not, then contents disposed of under proper manifests.
2. All tanks will be sold, if possible; if not, then tanks will be cut up and sold for scrap.
3. Soil samples in tank areas and areas within dikes will be analyzed by a qualified engineering firm to determine if any surface or subsoil contamination exists, and if so, such contaminated surface or subsoil will be excavated and removal will be accomplished by licensed contractors.
4. It is estimated that the maximum waste in storage at the facility at any given time is 800,000 gallons of liquid waste.

RE: 40 CFR 265.111

It is anticipated that upon closure of the facility no maintenance would be required and there would be no residual danger to environment or personnel.

RE: 40 CFR 265.112

The facility leases property from the Metropolitan Sanitary District and the current lease will expire in the year 2051. It is therefore anticipated that, if the lease is not renewed, closure will be completed in the year 2051.

A notice of intent to close the facility should be filed by July 1, 2050 allowing the summer months for testing of soil samples to determine if excavation and fill will be required. If required, excavation and fill should be undertaken and completed before the ground freezes in December of 2050 or January of 2051.

RE: 40 CFR 265.115

When closure is completed certification by owner/operator and an independent registered professional engineer that the property/facility has been closed in accordance with the specifications, in the closure plan will be submitted to the Regional Administrator.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Terry Evans
Vice President, Shipyard
Hannah Marine Corp.
13155 Grant Road
Lemont, IL 60439

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Deb Bowen 5/14/09

C. Signature

X Deb Bowen ☐ Agent ☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☒ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7001 0320 0005 8922 5428

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 12 2009

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Terry Evans
Vice President, Shipyard
Hannah Marine Corp.
13155 Grant Road
Lemont, Illinois 60439

LR-8J

Re: Notice of Violation
Hannah Marine Corp.
EPA ID No.: ILD 069 496 248

Dear Mr. Evans:

On September 11, 2007, a representative of the U.S. Environmental Protection Agency inspected the Hannah Marine Corp. ("Hannah Marine") installation located at 13155 Grant Road in Lemont, Illinois. The purpose of the inspection was to evaluate Hannah Marine's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Enclosed please find a copy of the inspection report for your reference.

Based on information provided by Hannah Marine personnel, review of records, and personal observations made by the inspector at the time of the inspection, EPA has determined that Hannah Marine is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR).

To be eligible for the exemption from having a hazardous waste storage permit, Hannah Marine must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. We find that Hannah Marine was in noncompliance with the following conditions for a hazardous waste storage permit exemption and was in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage permit, a generator of hazardous waste must ensure that each tank of hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste." See, 35 IAC § 722.134 (a)(3) [40 CFR § 262.34(a)(3)].

At the time of the inspection, Hannah Marine was managing one (1) solvent tank which was not marked with the words, "Hazardous Waste." Hannah Marine therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.

2. In order to avoid the need for a hazardous waste storage permit, a generator of hazardous waste who stores hazardous waste in tanks must inspect, at least once each operating day, above ground portions of the tank system to detect corrosion or releases of waste, and the construction material immediately surrounding the externally accessible portion of the tank system, including secondary containment to detect erosion or signs of releases of hazardous waste. See, 35 IAC § 722.134(a)(1)(ii) [40 CFR § 262.34(a)(1)(ii)]. This is also a requirement of owners and operators of hazardous waste storage facilities that store hazardous waste in storage tanks. See, 35 IAC § 725.195(c)(1) and (2) [40 CFR § 265.195(c)(1) and (2)].

At the time of the inspection, Hannah Marine produced weekly, not daily, inspection logs for Tank No. 26, which contains waste mixed solvents. A Hannah Marine employee was informed that the regulations require daily inspections of hazardous waste storage tanks. Hannah Marine therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility tank requirement.

3. In order to avoid the need for a hazardous waste storage permit, a generator of hazardous waste must meet all of the requirements of the contingency plan as required in Subpart D (contingency plan and emergency procedures) of 40 CFR Part 265. See, 35 IAC § 722.134(a)(4) [40 CFR § 262.34(a)(4)]. This is also a requirement of owners and operators of hazardous waste storage facilities. See, 35 IAC § 725.152(a) and (c) [40 CFR § 265.52(a) and (c)]. Additionally, generators of hazardous waste are required to submit a copy of their contingency plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. See, 35 IAC § 725.153(b) [40 CFR § 265.53(b)].

At the time of the inspection, Hannah Marine did not include in its contingency plan, identified as its "Facility Response Plan" (FRP), a description of the arrangements agreed to by the local police department, fire department or hospitals. Hannah Marine did not address in its FRP actions facility personnel must take in the event of a fire or explosion. Hannah Marine therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the contingency plan requirements. In addition, Hannah Marine may not have sent its FRP to the local police and fire departments.

4. In order to avoid the need for a hazardous waste storage permit, a generator who manages a hazardous waste tank and appurtenant equipment (e.g., pumps, valves, flanges, connections) in light liquid service must mark all equipment subject to the requirements of 35 IAC § 725.952 – 35 IAC § 725.960 [40 CFR § 265 Subpart BB] in such a manner that can be distinguished readily from other pieces of equipment. See, 35 IAC § 722.134(a)(1)(ii) [40 CFR § 262.34(a)(1)(ii)]. This is also a requirement of 35 IAC § 725.950 (d) [40 CFR § 265.1050(d)]. Each valve in light liquid service must be monitored monthly to detect leaks, and where leaks are detected, shall be repaired as soon as practicable but no later than 15 calendar days after the leak is detected. See, 35 IAC §

725.957 (a) and (d)(1) [40 CFR § 265.1057 (a) and (d)(1)]. Each tank in light liquid service using Level 1 controls, must be visually inspected on or prior to the date the tank becomes subject to the requirements of 40 CFR § 265 Subpart CC, and annually thereafter, to check for defects including, but not limited to, visible cracks, holes, or gaps in the tank, damage to seals or gaskets on the closure devices, and broken or missing hatches, access covers, caps or other closure devices. See, 40 CFR § 265.1084(c)(4)(i) and (ii). Owners or operators of tanks using Level 1 controls must determine the maximum organic vapor pressure of the hazardous waste to be managed in the tank prior to the first time hazardous waste is placed in the tank. See, 40 CFR § 265.1084(c)(1).

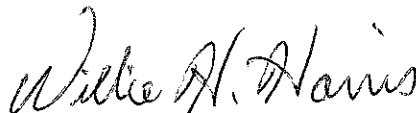
Hannah Marine did not tag equipment serving Tank No. 26 and was not conducting the inspections required by 40 CFR § 265 Subparts BB and CC.

5. A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a hazardous waste permit exemption of 35 IAC § 722.134 [40 CFR § 262.34] is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)]. Upon failing to meet the conditions for a hazardous waste permit exemption identified in item numbers 1 through 4 above, Hannah Marine became an operator of a hazardous waste storage facility. Hannah Marine has not applied for or received a hazardous waste storage permit nor does Hannah Marine have interim status. Hannah Marine's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring Hannah Marine to apply for a hazardous waste storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Michael Valentino, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Valentino, of my staff, at (312) 886-4582.

Sincerely,



Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (w/ enclosure)



Land and Chemicals Division

Type of Document:

Notice of Violation
Information Request

Facility Name:

Hannah Marine Corp.

Facility Location:

13155 Grant Road

Facility City:

Lemont

Facility State:

IL

Facility ZIP Code:

60439

U.S. EPA ID Number:

ILD 069 496 248

Assigned Staff			
Michael Valentino	(LCD/RCRA)	Phone:	886-4582
Tamara Carnovsky	(ORC)	Phone:	886-2250

Name	Signature		Date
Author	Michael Valentino	X <i>Michael Valentino</i>	5-5-09
Regional Counsel	Tamara Carnovsky	X <i>Tamara Carnovsky</i>	5-5-09
ORC Section Chief		X	
Section Chief	Lorna M. Jereza	X <i>Lorna M. Jereza</i>	5/9/09
Branch Chief	Willie H. Harris	X <i>Willie H. Harris</i>	5/11/09
Division Director	Margaret M. Guerriero	X	
Regional Administrator	Mary Gade	X	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

Date stamp the cover letter;

Make four copies of the contents of this folder:

- One copy for the assigned staff;
- One copy for the section file;
- One copy for the branch file; and
- One copy for the official file.

Make any additional copies for cc's or bcc's

cc's:

bcc's:

Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;

E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

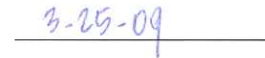
MEMORANDUM TO FILE

INSTALLATION NAME: Hannah Marine Corp.
U.S. EPA ID No.: ILD 069 496 248
LOCATION ADDRESS: 13155 Grant Road
Lemont, IL 60439
NAIC CODE: 48839 (Marine cargo handling)
DATES OF INSPECTION: September 11, 2007
U.S. EPA INSPECTOR: Michael Valentino

PREPARED BY:

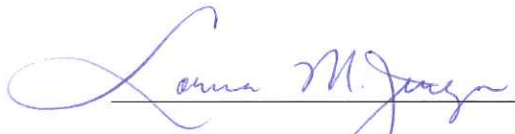


Michael Valentino
Environmental Engineer



Date

REVIEWED BY:



Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch



Date

Purpose of Inspection:

The purpose of the inspection was to perform an unannounced compliance evaluation inspection (CEI) at Hannah Marine Corp. ("Hannah Marine"), a large quantity generator of hazardous waste, to determine its compliance with the Resource Conservation and Recovery Act, specifically the Standards Applicable to Generators of Hazardous Waste, Standards for Land Disposal Restrictions, and Management of Used Oil set forth at 35 Illinois Administrative Code (IAC), Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, and Title 40 of Code of Federal Regulations (40 CFR) Parts 262 to 265, 268 and 279, respectively.

Participants:

Terry Evans, Vice President (ph: 630-257-5457), Rich Mikolaitis, Shipyard Supervisor, and Kim Sawyer, Shipyard Office Administrator, represented Hannah Marine during the inspection. Michael Valentino, RCRA Branch, Land and Chemicals Division, represented EPA Region 5.

Installation Description:

Hannah Marine owns and operates a marine cargo cleaning operation located in Lemont, Illinois. Hannah Marine leases land from the Metropolitan Sanitary District (MSD). Hannah Marine began operations at this location in 1951. Its lease with MSD expires in 2050.

Hannah Marine submitted its initial Notification of Hazardous Waste Activity on August 13, 1980. Originally, Hannah Marine notified as a hazardous waste generator. On November 19, 1980, Hannah Marine submitted its Part A permit application. At that time, Hannah Marine anticipated the need to store hazardous waste for more than 90 days. Subsequently, Hannah Marine requested withdrawal of its permit application on June 7, 1983.

The installation is situated alongside the Chicago Sanitary & Ship Canal, approximately two miles south of Interstate 55 and one-quarter mile northwest of the intersection of Illinois Route 83 (Kingery Highway) and Illinois Route 171 (Archer Avenue). Hannah Marine is situated just east of the Illinois & Michigan Canal National Heritage Corridor, southeast of Argonne National Lab, north of Cog Hill golf course and west of the Palos Heights Forest Preserve. The nearest residential area is situated one-half mile northeast of the site, between 91st Street on the north and the canal on the south, and east of Route 83.

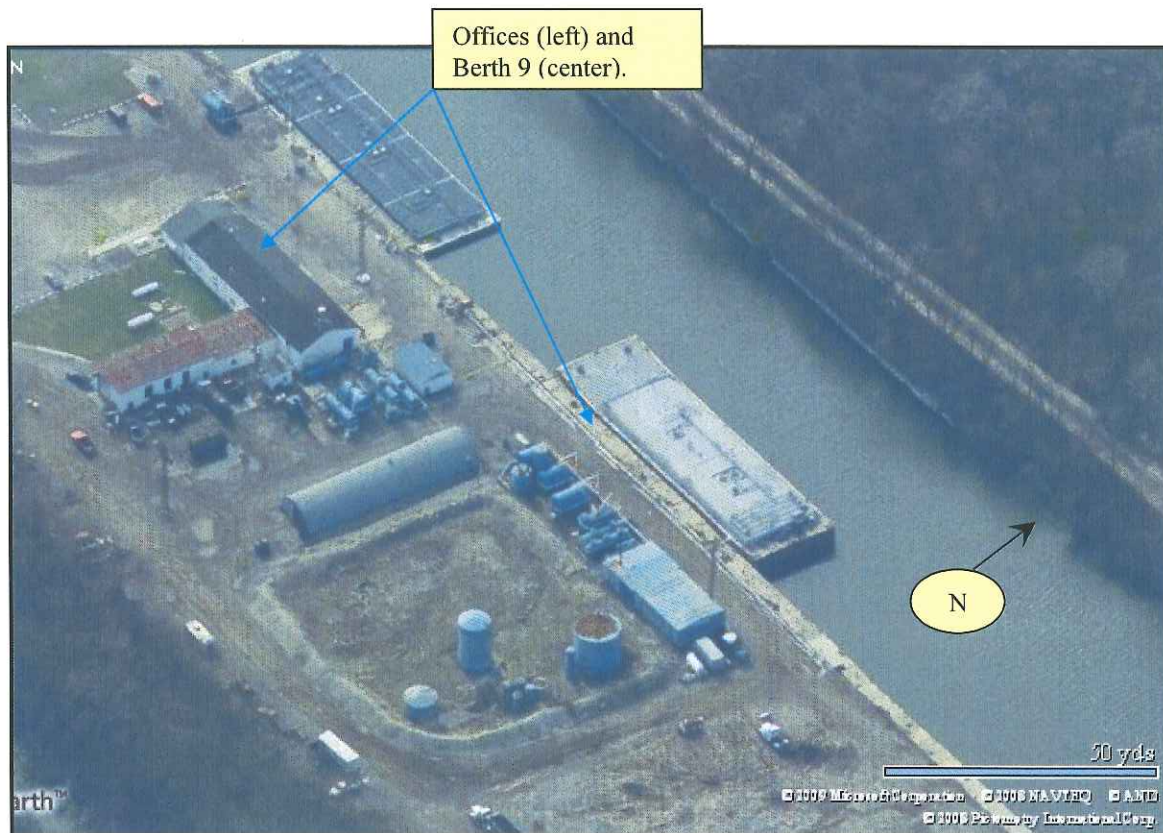
Hannah Marine employs approximately seven people in its shipyard. Overall, Hannah Marine has between 200 to 300 employees. Hannah Marine owns and operates 13 tug boats and occupies 17 berthing locations along the canal.

Hours of operation are 7:00 am to 3:30 pm, Monday through Friday. Hannah Marine cleans out barges, and sends used cleaning solution – consisting of a caustic solution – to a tank farm located at Berth 9.

Hazardous waste is hauled to facilities such as Lone Star Industries (Greencastle, IN), Systech Environmental Corp. (Paulding, OH), Century Environmental Resources, Inc. (Alsip, IL) and Beaver Oil Company (Hodgkins, IL). Hazardous waste streams generated by Hannah Marine include spent mixed solvents, which are sent to Lone Star for incineration, and caustic soda, which is sent to Beaver Oil Company for neutralization.

Hazardous waste is managed in Tank 26 at this installation. Hannah Marine generate one waste stream, spent solvents, that would trigger Subpart BB or CC requirements. Hazardous wastes generated at this installation are hazardous on the basis of being characteristic (D001, D002, D003, D011) or are listed based on the process generating the waste (F006, F007).

Aerial views of this installation are provided below.¹



¹ Aerial views obtained via Microsoft Virtual Earth™ at:
http://iaspub.epa.gov/enviro/lrt_viewer.map_page?sys_acrnm=RCRAINFO&sys_id=ILD069496248



Opening Conference:

I arrived at Hannah Marine at approximately 12:45 pm on Tuesday, September 11, 2007. I proceeded to the offices, which are located east of the parking lot, and once in the reception area, I announced that I was from EPA and there to do a hazardous waste inspection. Mr. Evans was then summoned. He took me to his office. I showed him my enforcement credentials. Mr. Evans said he was new to his position as V.P. of the Shipyard, having taken that post from the recently departed Edward Hogan.

I asked for a brief overview of the installation's operations, and proceeded to ask several general questions relating to plant operations, employment and waste generation. Mr. Evans said that Hannah Marine repairs and cleans out barges, and wastes are hauled off-site by waste haulers. Mr. Evans offered to take me to the dock area where the tanks are located and where barges are cleaned.

Inspection and Observations:

We began the inspection of the tank and barge cleaning operations at approximately 1:05 pm. At the time of the inspection, there were no barges docked to the pier.

During the course of the inspection, I took eleven (11) photographs on a Nikon Coolpix® P4 digital camera, with 8.1 megapixel resolution. The photographs were downloaded to a JPG.file.

These photos are contained below within the body of this narrative. They are true and representative of the conditions I observed at the installation on the date of the CEI.

I observed a small tank farm situated immediately west of the cleaning plant pump house and approximately thirty (30) feet from the edge of the dock. I observed six (6) horizontal and two (2) vertical tanks in this area. The tanks were of varying lengths/heights and diameters. The four largest of the horizontal tanks have a capacity of approximately 12,000 gallons. The area was surrounded by a one-foot high concrete dike and the tanks rested on a concrete pad. The pad measured roughly thirty (30) feet north-south by one-hundred (100) feet east-west.

I climbed a ladder to a small observation/tank access deck, and took six (6) photographs from this vantage point. (See Photos 1-4, 9 and 10.)

I observed standing liquids inside of the containment area. As I walked around the tank farm, I could see no sheen on the surface of the liquid. I did not notice any odor. The liquid is most likely rainwater or washwaters.

The containment area is surrounded by a concrete berm, measuring approximately one (1) foot high by one (1) foot wide. This berm is in good condition. The tank farm is underlain by concrete, which also appeared to be in good condition. The tanks appeared to be in good condition, free of rust and any obvious integrity issues. The horizontal tanks appeared to have been painted fairly recently.

Mr. Evans identified the horizontal tank furthest west in the tank farm as the solvent tank, Tank No. 26. This tank did not have any markings identifying it as a hazardous waste tank. Mr. Evans claimed the tank contents are a "usable commodity." Hannah Marine does transport spent solvents for off-site incineration. At some point, contents from this tank are shipped under a hazardous waste manifest. Mr. Evans said the caustic solutions in two of the 12,000-gallon tanks have a pH of 14, and that these materials are reused. These two tanks did not have hazardous waste markings. Contents from this tank are shipped under a hazardous waste manifest. Tank No. 26 did not have tags identifying and distinguishing valves and flanges from other equipment, even though the tank's contents would place it in light liquid service, subject to the monitoring requirements of 40 CFR Part 264 Subparts BB and CC.²

² Light liquid service applies to containers and tanks whose hazardous waste meets the following conditions: (a) the vapor pressure of one or more organic constituents is greater than 0.3 kPa at 20°C (68°F), and (b) the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20°C (68°F) is equal to or greater than 20% by weight. Tank No. 26 is a mixed solvent tank. Vapor pressures of common solvents such as the following all exceed 0.3 kPa: MEK (10.37 kPa); toluene (2.93 kPa); TCE (7.69 kPa); xylene (0.8 kPa); acetone (26.6 kPa); MIBK (2.13 kPa)



Photo No. 1 Taken by: M. Valentino	Hannah Marine
9/11/07 1:10 pm Orientation: Southeast	Open manway on vertical tank (furthest east of the four 12,000 gallon tanks). Tank does not store hazardous waste. (See also Photo 2.)



Photo No. 2 Taken by: M. Valentino	Hannah Marine
9/11/07 1:10 pm Orientation: East	Open manway on vertical tank (furthest east of the four 12,000 gallon tanks). Tank does not store hazardous waste. Cleaning plant pump house is in the background.



Photo No. 3 Taken by: M. Valentino	Hannah Marine
9/11/07 1:10 pm Orientation: West	From same position as Photo 2, but looking west at two caustic soda tanks (horizontal tanks in foreground and center of photo). Vertical tank to the left is Tank 25, which is empty. Vertical tank in the center background is Tank 24, which holds fuel oil. The corrugated Quonset hut in the background to the left is the maintenance shop.



Photo No. 4 Taken by: M. Valentino	Hannah Marine
9/11/07 1:10 pm Orientation: Southwest (angled downward)	Liquids in secondary containment area. Liquids had no sheen or noticeable odor to them. (See also Photo 5.)



Liquid in containment area.

Photo No. 5 Taken by: M. Valentino	Hannah Marine
9/11/07 1:13 pm	Liquids in secondary containment area. Liquids had no sheen or noticeable odor to them.
Orientation: South	



Tank with open manway.

Solvent tank.

One-foot high concrete dike.

Photo No. 6 Taken by: M. Valentino	Hannah Marine
9/11/07 1:13 pm	Tank farm showing solvent tank (right, foreground) and caustic tanks to the left of the solvent tank.
Orientation: Southeast	



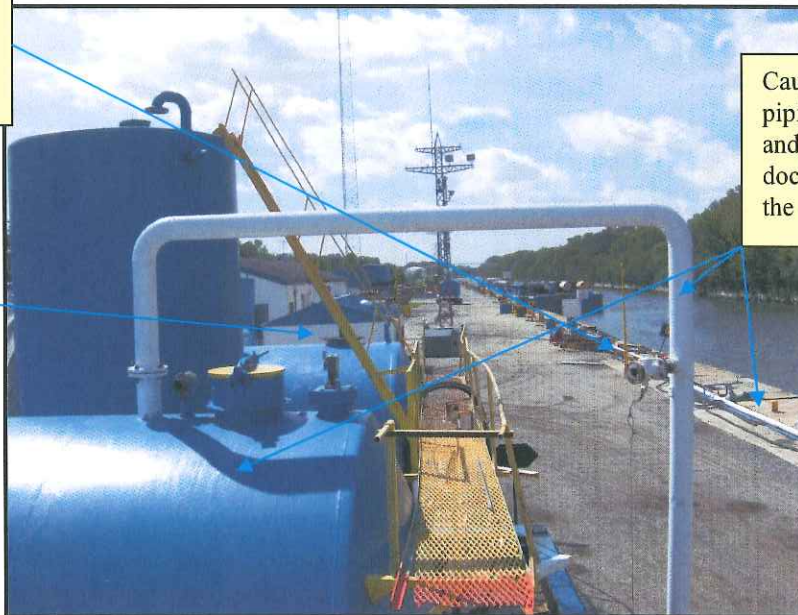
Photo No. 7 Taken by: M. Valentino	Hannah Marine
9/11/07 1:15 pm	
Orientation: Northeast	



Photo No. 8 Taken by: M. Valentino	Hannah Marine
9/11/07 1:15 pm	Tank 25 (foreground), with Tank 24 (center, background) and the caustic soda tank (right, background) and used solvent tank (left, background).
Orientation: North	

Hose connections, vacuum pumps and other equipment for barge cleaning.

No tags on solvent tank flange for Subparts BB and CC.



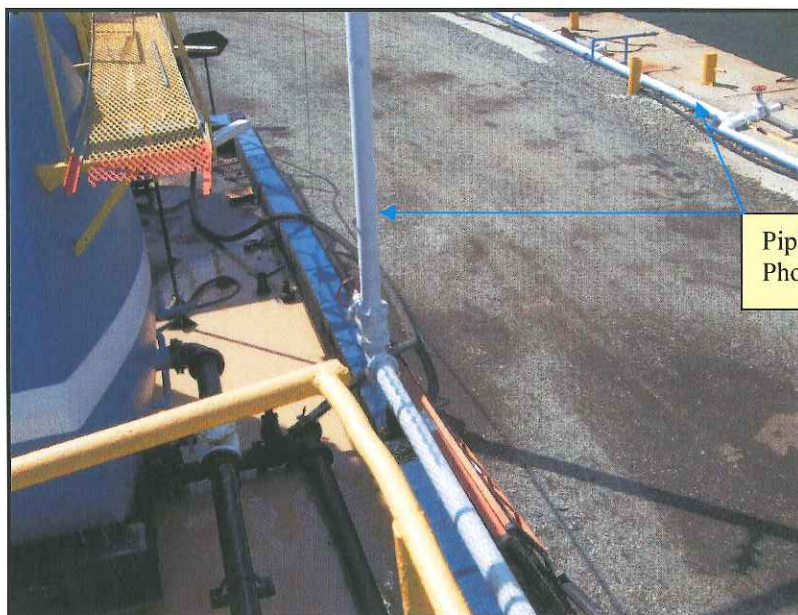
Caustic tank and piping connecting tank and pipe along the dock for flushing out the cargo holes.

Photo No. 9 Taken by: M. Valentino

9/11/07 1:18 pm
Orientation: West

Hannah Marine

Looking west from observation/access deck. Tank 24 is the vertical tank to the left of the photo. The caustic soda tank is in the foreground to the left. A six-inch line runs from this tank to the dock area. The solvent tank is behind Tank 24.



Piping shown in Photo 9.

Photo No. 10 Taken by: M. Valentino

9/11/07 1:18 pm
Orientation: Northwest

Hannah Marine

Caustic piping to dock and to caustic tanks.

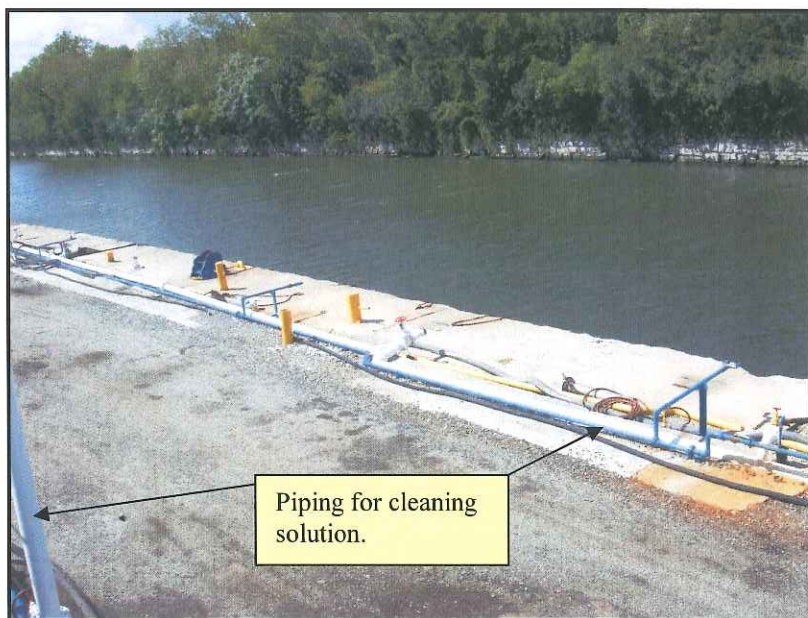


Photo No. 11 Taken by: M. Valentino	Hannah Marine
9/11/07 1:18 pm	Dock at Berth 9. Piping network that returns cleaning solutions to tank farm.
Orientation: Northwest	

When the tour of the barge cleaning area was completed, Mr. Evans and I returned to the office area where I would review the installation's records.

Records Review:

As for the records review portion of the CEI, Mr. Evans said that the shipyard supervisor could assist me. When we returned to the office area, Mr. Evans introduced me to Mr. Mikolaitis and Ms. Sawyer. I displayed my enforcement credentials for Mr. Mikolaitis. At that time, Mr. Evans excused himself, and I followed Mr. Mikolaitis to his office.

I explained to Mr. Mikolaitis that I wished to review shipping manifests for the most recent three-year period, tank inspection logs, tank assessments by an independent professional engineer, the most recent contingency plan and personnel training records. Mr. Mikolaitis said that Ms. Sawyer keeps most of the records and that her assistance would be needed. We then left Mr. Mikolaitis' office and I sat at a chair in front of Ms. Sawyer's desk. She proceeded to retrieve as many of the documents as she could locate.

The manifests were properly filled out and appeared to be in good order.

I reviewed the installation's hazardous waste contingency plan, which is referred to as the Facility Response Plan (FRP). I noted that the FRP addresses spills but does not address the potential release of hazardous waste due to fires or explosions. The FRP also lacks a description of the arrangements agreed to by local police and fire departments, hospitals, contractors and

State and local emergency response teams. Upon request, Hannah Marine could not produce documentation that the FRP had been sent to the local police and fire departments. Mr. Mikolaitis said that the Tri-State Fire Dept. visits Hannah Marine each year.

I asked for and received inspection logs for Tank No. 26. Hannah Marine produced weekly inspection logs. I did point out to Mr. Mikolaitis that the regulations required daily inspections of hazardous waste tanks. Hannah Marine was not able to produce a tank assessment for Tank No. 26.

Hannah Marine is not conducting Subpart BB and CC inspections on its solvent tank.

I reviewed the personnel training records. Hannah Marine conducts annual hazardous waste training. The most recent training prior to the inspection was conducted on December 5, 2006. At that training, the following employees were trained: Raymond England, Rich Mikolaitis, Eduardo Victor, Joseph DeGenova, Robert Peters, Armando Sanchez, Edward Hogan and Vicente Mancera.

Exit Interview:

I held a brief exit interview with Mr. Mikolaitis and Ms. Sawyer. I summarized my findings and pointed out the areas which appeared to be lacking, including the daily tank inspection requirement and the need to have a written tank assessment for the hazardous waste tank.

I left the installation at approximately 3:00 pm.

Lorna Jereza/R5/USEPA/US

05/07/2009 06:54 AM

To Illinois EPA

cc Michael Valentino/R5/USEPA/US

bcc

Subject Enforcement Actoon Communication- Hannah Marine
Corporation (NOV)

This is to inform you that on May 11, 2009, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to Hannah Marine Corporation located in Lemont, IL. The alledged violations were found during U.S. EPA's September 11, 2007 compliance evaluation inspection of Hannah Marine Corporation.

Contact: Michael Valentino, (312) 886-4582



NOV_Final_5-4-09.doc

(11) (18)

Date 09/09/82

(20) _____ (25)

Letter Sent (Yes or No)

(26)

Weather *B. H. clear, cool*

Inspector *C. J. L.*

$$(27) \quad \frac{1}{\sqrt{2\pi}} \int_{-\infty}^{\infty} \frac{e^{-itx}}{1 + itx} dt = e^{-|x|}$$

Previous Inspection

Previous Correspondence

Site Open: Yes(☒) No(☐)

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (S)

Landfill ()

Storage (X)

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other Gen (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

(30)

Illegal (5) () *4/2*

(31)

IMPROVED

SAME

LPC 4 1/79 5,000

DETERIORATED

I S or D

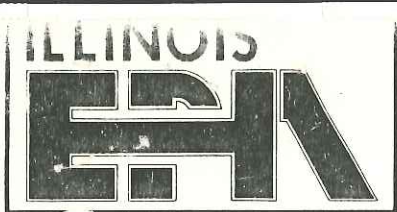
(62)

GENERAL REMARKS: This facility offers a top water repair and cleaning service for barges. The facility generates a hazardous waste consisting of wash water and waste materials cleaned from the barges / cargo hold. All of the manifest inspected indicated that the waste leaving the site are caustic wash water with a USEPA haz = D002. The waste is pumped from the barge into a 50,000 gallon tank before it is hauled to CID for disposal. Mr. Lambert stated that all waste are hauled off-site before they can accumulate on-site.

INTERVIEW: 90 days. Previous manifest forms indicate that this is true. This facility qualifies only as a generator, however, Mr. Lambert stated that he would like to remain as a storage facility as a precautionary measure. Mr. Lambert stated that other materials are also cleaned out of the barges. These materials are all hydrocarbons such as gasoline and benzene. The materials are pumped into a storage tank and then sold. The materials are not considered a waste. The facility has a total of 7 storage tanks, one 60,000 gal. tank and

DIAGRAM:

6 smaller tanks. The following deficiencies were noted during the inspection: no waste analysis, no waste analysis, no operation inspection records, no personnel training records, insufficient information in contingency plan, no operating record and no closure plan.



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

792

312/345-9780

Refer to: 04380204 - DuPage County - Lemont/Hannah Marine
ILD069496248

May 13, 1982

Hannah Marine
361 Frontage Road - Suite 101
Burr Ridge, Illinois 60521

Hannah Marine
Kingery Road @ Archer Avenue
Lemont, Illinois 60439

Attn: Carl Lambert

Attn: Bill Wilson

Dear Mr. Lambert:

On April 9, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Hannah Marine in Lemont, Illinois. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.13(a), the owner/operator must obtain a detailed chemical and physical analysis of waste treated or stored at the site. The owner/operator is deficient in that no such analysis was available at the time of the inspection. UB

Pursuant to 40 CFR 265.13(b), the owner/operator must have on file at the facility a detailed written waste analysis system describing the procedures to be used to compile data required under 40 CFR 265.13(a). The owner/operator is deficient in that no such plan was present at the site on the date of the inspection. UB

Pursuant to 40 CFR 265.15(b) the owner/operator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors, discharges, safety and emergency equipment, security devices, and operating and structural devices. Your facility is deficient in that no such records were available at the time of the inspection. UB

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the UB

facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the contingency plan did not list the names, addresses, and phone numbers of all persons qualified to act as emergency coordinators, a plan describing evacuation routes and signals used to begin evacuation and copies of the contingency plan have not been submitted to local emergency response organizations.

Pursuant to 40 CFR 265.16, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. The owner/operator is deficient in that no such records were available at the time of the inspection.

Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Your facility is deficient in that a written operating record was not available at the time of the inspection.

The owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on site at any given time and a schedule for final closure including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. These requirements are pursuant to 40 CFR 265.112. Your facility is deficient in that a closure plan was not available at the time of the inspection.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Craig J. Liska of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:CJL:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

04380204
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD06949624P
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Hannah Marine
(B) Street: Kingery Road at Archer Ave
(C) City: Lemont (D) State: IL (E) Zip Code: 60439
(F) Phone: (312) 242-3210 (G) County: Du Page
(H) Operator: Same
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Hannah Marine
(P) Street: 361 Frontage Road
(Q) City: Burr Ridge (R) State: IL (S) Zip Code: 60521
(T) Phone: (312) 242-3210 (U) County: Du Page
(V) Date of Inspection: 4-9-82 (W) Time of Inspection (From) 1:30 p (To) 4:00 p
(X) Weather Conditions: Partly cloudy, wet, ~40°

Non-applicable information contained
on pages 12 thru 18 has been omitted

(Y)	Person(s) Interviewed	Title	Telephone
	<u>Carl Lambert</u>	<u>Mgr. Safety & Compliance</u>	<u>(312) 242-3210</u>
	<u>Bill Wilson</u>	<u>Mgr. Shipyard</u>	<u>same</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>Craig J. Liska</u>	<u>IEPA/ERSI</u>	<u>(312) 345-9780</u>
(AA)	Preparer Information		
	Name <u>Craig J. Liska</u>	Agency/Title <u>IEPA/ERSI</u>	Telephone <u>(312) 345-9780</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p>1. Containers (I)</p> <p><u>2.</u> Tanks (J)</p> <p>3. Surface Impoundments (K)</p> <p>4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	<u>N/A</u>	
2. Facility expansion?	—	—	<u>N/A</u>	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	<u>✓</u>	—	<u>analysis not at the site</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	<u>✓</u>	—	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	<u>N/A</u>	
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	—	—	<u>security guard</u>
2. Artificial or natural barrier around facility?	—	<u>✓</u>	—	<u>24-Hour Surveillance</u>
3. Controlled entry?	—	<u>✓</u>	—	<u>" " "</u>
4. Danger sign(s) at entrance?	<u>✓</u>	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	<u>✓</u>	—	<u>no inspection records</u>
2. Records of operator error?	—	<u>✓</u>	—	
3. Records of discharges?	—	<u>✓</u>	—	

*Not Inspected

1.1. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	-----
5. Safety, emergency equipment?	---	✓	---	-----
6. Security devices?	---	✓	---	-----
7. Operating and structural devices?	---	✓	---	-----
8. Inspection log?	---	✓	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	✓	---	<i>No personnel records</i>
2. Job descriptions?	---	✓	---	<i>of training</i>
3. Description of training?	---	✓	---	-----
4. Records of training?	---	✓	---	-----
5. Have facility personnel received required training by 5-19-81?	✓	---	---	-----
6. Do new personnel receive required training within six months?	✓	---	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	-----
2. No smoking signs?	✓	---	---	-----
3. Separation and protection from ignition sources?	✓	---	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

____ ☒ ____

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

☒ ____

2. Telephone or 2-way radios
at the scene of operations?

☒ ____

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ____

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ ____

2. Is emergency equipment
maintained in operable
conditions?

☒ ____

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

☒ ____

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

✓

 ✓

✓

 ✓

No home phone numbers or addresses

No evacuation plan

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>copy only at site</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ✓ — No operating record

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— ✓ —

- c. The location and quantity of each hazardous waste within the facility?

— ✓ —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— N/A —

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— ✓ —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— N/A —

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

— ✓ —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>			<u>no closure plan</u>
2. Has this plan been submitted to the Regional Administrator	<input checked="" type="checkbox"/>			
3. Has closure begun?	<input checked="" type="checkbox"/>			
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				<u>N/A</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?			<u>N/A</u>	<u>waste stored only in tanks</u>
2. Are containers compatible with waste in them?				
3. Are containers stored closed?				
4. Are containers managed to prevent leaks?				
5. Are containers inspected weekly for leaks and defects?				
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)				

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	N/A	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	-----

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	N/A	tanks are covered
3. Do continuous feed systems have a waste-feed cutoff?	---	---	N/A	no continuous feed system
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	N/A	-----
5. Are required daily and weekly inspections done?	✓	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	N/A	no reactive or ignitable wastes
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓	---	---	-----

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 60,000 gallons (largest tank)

Tank diameter: _____ feet

Distance of tank from property line ~ 100 yds feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

N/A

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	N/A	_____
4. Are inspection procedures followed according to 265.403?	—	—		_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—		_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—		_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	—	—	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	—	—	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	—	—	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	<u>not needed yet</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	<u>waste stored in tanks</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	—	—	N/A	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	—	—	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	—	—	—	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—	—	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—	—	_____
c. Do continuous feed systems have a waste-feed cutoff?	—	—	—	_____
d. Are required daily and weekly inspections done?	—	—	—	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	—	—	—	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	—	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	<u>not needed yet</u>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
--	--------------------------	-------------------------------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	—	—	<u>N/A</u>	

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	—	—	—	
B. Are signed completed manifest(s) on file?	—	—	—	

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	—	—	—	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	—	—	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

This facility is a top-water repair and cleaning center for barges. A hazardous waste is generated when the barge's cargo hole is cleaned. The manifests indicate that the waste is a caustic wash water with the US EPA hazardous waste number being 0002. The wastes are removed before they can accumulate over 90 day. Mr. Lambert stated that he would prefer that the facility remain listed as a storage facility as a precautionary measure. The following deficiencies were observed during this inspection: no waste analysis, no waste analysis plan, no operator inspection records, no personnel training records, no closure plan, no operating record and contingency plan did not identify emergency coordinator, list evacuation plan, and copies of the plan were not sent to local police dept., fire dept. and hospitals.

HANNAH MARINE

CORPORATION

October 29, 1981

U.S. EPA
Region V
RCRA Activities
P.O. Box A3587
Chicago, IL 60690-3587

Attn: Mr. Allen Debus

Re: Permit (ILD 069496248)

Dear Mr. Debus:

I am presuming that the questions referred to apply to our proposal plans for storage and treatment.

As yet, we have not completed plans for such operations, but are looking at biological treatment as our most probable solution.

In the meantime, we are continuing to dispose of waste materials through authorized carriers and sites.

Very truly yours,

HANNAH MARINE CORPORATION



Carl F. Lambert
Manager of Safety/Compliance and
Employee Relations

CFL:ds

cc :DEU



RECEIVED

NOV 2 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

ILDO69496248

June 10, 1980

Mr. Lambert
Hannah Marine Corp.
P.O. Box 189
Lemont, Illinois 60439

Dear Mr. Lambert:

As per our telephone conversation on 10th of May 1980, I have sent you a copy of the 19th of May 1980 Federal Register which contains the promulgated regulations mandated by the Resource Conservation and Recovery Act of 1976 (RCRA). The regulations (40 CFR Part 262) issued under 3002 of RCRA are the standards for generators. The regulation (40 CFR Part 262.34) concerning accumulation time state that "a generator may accumulate hazardous waste on-site without a permit for 90 days or less".

EPA has decided that if a tank is being used for on-site accumulation of hazardous waste, then the 90 day maximum accumulation time allowable for generators refers to the residence time of the hazardous waste in the tank. That is, if the ratio of the total tank volume to the flux out of the tank is less than or equal to 90 days then the generator will be in compliance with 40 CFR Part 262.34 (a)(1).

In regards to Hannah Marine Corporation, this means that at least 3,112 gallons must be drawn from each 40,000 gallons tank and shipped off-site each week. This figure is based on the following calculation:

Residence time = (volume of tank)/(flux out of tank)
90 days = (40,000 gallons)/(flux out of tank)
flux out of tank = 40,000 gallons/90 days
 = 445 gallons/day
 = 3,112 gallons/week

If Hannah Marine Corporation, at any time, ships less than 3,112 gallons/week off-site from each 40,000 gallon tank, then, according to 40 CFR Part 262.34 (b), Hannah Marine is an operator of a storage facility and is subject to the requirement of 40 CFR Part 122. Should you decide to notify EPA as a storage facility I recommend that you pay particular attention to Subpart J of Part 265 regarding Tanks.

I hope that this information will be of help to you. A copy of the Federal Register containing the aforementioned regulations has been sent to you and should arrive shortly. Your name has been place on a list to receive the notification packet which will be sent out at a later date. If you have any futher questions, please do not hesitate to call.

Sincerely,

Elissa Brown, Geologist